

# EXHIBIT

12

**Maximilian D. Cadmus**

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**From:** Steve Harvey <steve@steveharvelaw.com>  
**Sent:** Sunday, April 11, 2021 10:27 AM  
**To:** Eric W. Moran  
**Cc:** Mike Gehring; Theodora McCormick; Maximilian D. Cadmus  
**Subject:** RE: Ryu v. Bank of Hope  
**Attachments:** 2021.04.07 Joint Discovery Plan.docx

\*\*\* EXTERNAL EMAIL \*\*\*

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Dear Eric:

Please find a draft of the joint discovery plan. I am sorry that I did not get it to you earlier. It is due on Monday but not until the end of the day.

You can just let me know your views please on what I filled in and on the subjects I left blank, including the various deadlines. I think 6 months for discovery should be enough but if you want to go for more than that please let me know and the other deadlines will be derived from that deadline.

As for initial disclosure, please tell me when you want to do that. We are ready to do that when you are.

In our recent phone call, you asked if section b of the prayer for relief in the Complaint is in play. The answer is no, that related only to Count I.

Please let me know about items b-e in the prayer for relief in the Bank's counterclaim. I do not think that you have any basis to seek any of that relief given the allegations.

Thank you.

Stephen G. Harvey  
**Steve Harvey Law LLC**  
1880 John F. Kennedy Blvd.  
Suite 1715  
Philadelphia, PA 19103  
215.438.6600

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**From:** Eric W. Moran <EMoran@ebglaw.com>  
**Sent:** Monday, March 22, 2021 2:40 PM  
**To:** Steve Harvey <steve@steveharvelaw.com>  
**Cc:** Mike Gehring <mike@steveharvelaw.com>; Theodora McCormick <TMcCormick@ebglaw.com>  
**Subject:** RE: Ryu v. Bank of Hope

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Steve,

The Rule 16 conference is scheduled for April 19. We are available to meet and confer regarding a joint discovery plan on Thursday the 25th, Friday the 26th or Monday the 29<sup>th</sup> (after reviewing Ryu's Answer to the Bank's counterclaim). I assume you will be taking the lead in preparing your views on what should be included in the proposed joint discovery plan in respect of Count 2, which we request to review ahead of our meet-and-confer.

Separately, plaintiff is in default of its obligation to file an Answer to the Bank's Counterclaim. Rather than address it with the Court, that is one of the dates we wished to discuss. To the extent you determine to request an extension of time, we would consent to such extension through Thursday, March 25.



Thanks,

Eric

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BECKER  
GREEN

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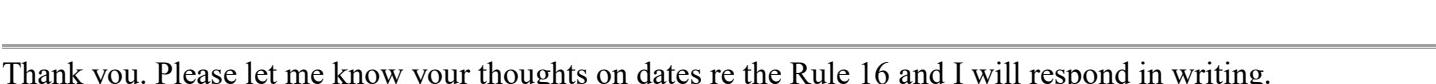
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**From:** Steve Harvey <[steve@steveharveylaw.com](mailto:steve@steveharveylaw.com)>  
**Sent:** Monday, March 22, 2021 1:21 PM  
**To:** Eric W. Moran <[EMoran@ebglaw.com](mailto:EMoran@ebglaw.com)>  
**Cc:** Mike Gehring <[mike@steveharveylaw.com](mailto:mike@steveharveylaw.com)>; Theodora McCormick <[TMcCormick@ebglaw.com](mailto:TMcCormick@ebglaw.com)>  
**Subject:** RE: Ryu v. Bank of Hope

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Thank you. Please let me know your thoughts on dates re the Rule 16 and I will respond in writing.



If that is all you wish to discuss, it does not appear that there is a need for a phone call at this time.

[REDACTED] Also, if after you propose date re the Rule 16 there are other matters we need to discuss in prep for that, we can talk further by phone if necessary.

Stephen G. Harvey  
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**From:** Eric W. Moran <[EMoran@ebglaw.com](mailto:EMoran@ebglaw.com)>  
**Sent:** Monday, March 22, 2021 12:19 PM  
**To:** Steve Harvey <[steve@steveharvelaw.com](mailto:steve@steveharvelaw.com)>  
**Cc:** Mike Gehring <[mike@steveharvelaw.com](mailto:mike@steveharvelaw.com)>; Theodora McCormick <[TMcCormick@ebglaw.com](mailto:TMcCormick@ebglaw.com)>  
**Subject:** RE: Ryu v. Bank of Hope

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Sure – dates around the upcoming Rule 16 conference and [REDACTED] What time works best?

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**From:** Steve Harvey <[steve@steveharvelaw.com](mailto:steve@steveharvelaw.com)>  
**Sent:** Monday, March 22, 2021 11:01 AM  
**To:** Eric W. Moran <[EMoran@ebglaw.com](mailto:EMoran@ebglaw.com)>  
**Cc:** Mike Gehring <[mike@steveharvelaw.com](mailto:mike@steveharvelaw.com)>; Theodora McCormick <[TMcCormick@ebglaw.com](mailto:TMcCormick@ebglaw.com)>  
**Subject:** RE: Ryu v. Bank of Hope

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I can do it but let me check with Mike. Can you tell us what you would like to discuss?

Stephen G. Harvey  
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**From:** Eric W. Moran <[EMoran@ebglaw.com](mailto:EMoran@ebglaw.com)>  
**Sent:** Monday, March 22, 2021 10:50 AM  
**To:** Steve Harvey <[steve@steveharvelaw.com](mailto:steve@steveharvelaw.com)>  
**Cc:** Mike Gehring <[mike@steveharvelaw.com](mailto:mike@steveharvelaw.com)>; Theodora McCormick <[TMcCormick@ebglaw.com](mailto:TMcCormick@ebglaw.com)>  
**Subject:** Ryu v. Bank of Hope

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Steve – would you have a few minutes for a call today? We could be available after 3:30.

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